

16 August 2005

BtN Access, Inc.
12100 Sunset Hills Road, Suite 300
Reston, VA 20190
(703) 621-1600

FCC Report on Compliance with VoIP Subscriber Notifications

BtN Access, Inc., a small VoIP provider based in Northern Virginia provided written notice to 32 of its 34 VoIP subscribers during the week of July 25, 2005 via U.S. Mail, advising them of the limitations on E911 service associated with its VoIP service, as outlined in the FCC's Order of June 3, 2005. The letters requested that an affirmative acknowledgement be returned to BtN Access, Inc. no later than August 15, 2005. A copy of the initial letter to customers is attached as Appendix A to this report.

Two customers were overlooked in the initial sweep. Those customers were emailed notification letters on August 16, 2005, as well original letters via overnight mail. A copy of this letter is attached as Appendix B to this report.

All customers, including the two customers who were notified late as per paragraph 2 above, have been provided, along with the notification letter, warning labels for use with their VoIP-compatible devices, notifying the user of the possible limitations on E911 service using that device. Customers received a quantity of warning labels consistent with the number of 'seats' purchased from BtN Access, Inc. and were offered additional labels on an 'as requested' basis.

As of the date of this report, BtN Access has received signed acknowledgements from approximately 47% (16) of its thirty-four subscribers. Fifteen out of the original 32 customers to receive the notifications have returned their acknowledgements, as well as one of the two customers who received soft copy notifications today.

BtN Access' customer service team has followed-up with each of the remaining customers during the week of August 8th at least once by phone and once by email. An additional three (3) customers have committed to return their acknowledgements this week. Based on the responses to these follow-up calls and emails, BtN Access, Inc. anticipates that approximately 15% (5) of its subscribers will not return acknowledgements by the deadline of August 29, 2005.

A subsequent letter to all customers who have not returned their acknowledgements is being sent today, August 16, 2005, via email, to remind customers of the need to return their acknowledgements and to advise them that BtN Access, Inc. is required to suspend services to them if the acknowledgements are not received by August 29, 2005. A copy of the text of this email message is attached as Appendix C to this report. BtN Access is continuing to follow up with these customers via phone and email during the week of August 15th and on a daily basis beginning the week of August 22, 2005.

BtN Access, Inc. is maintaining a compliance file for all received acknowledgments, along with copies of the original notifications and any follow-up emails. Customer Service also has designated a single point of contact to maintain a database of phone calls and outstanding acknowledgements.

16 August 2005

You may contact Cynthia R. Perkinson, Vice President-General Counsel of BtN Access, Inc. at (703) 621-1623. Ms. Perkinson's email address is cperkinson@btnaccess.com. She can be reached via U.S. mail at BtN Access' office address set forth above.

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Appendix A
Text of Original BtN Access Customer Notification Letters
Sent Via U.S. Mail
(Week of July 25, 2005)

Dear _____:

The FCC recently issued its order on the provision E911 services that includes a requirement that service providers notify their customers of the limitations on any Voice over IP service. As a customer of BtN Access' Hosted PBX Service (formerly IP Centrex) (the "Service"), you should be aware that emergency dialing (E911) may not be available under certain circumstances, as described below:

- (1) If you move the IP-compatible equipment that you use to access the Service (whether a phone or personal computer or other device) from the registered location, as specified in your order form. Each phone number is registered in a national database (the "ALI Database") to a specific site address for emergency response purposes. If you dial E911 from a remote location using the Service, emergency personnel will respond to the registered site location listed in the ALI Database. They will not be able to identify or track your remote location; or
- (2) If you are using a number for a location that is outside the Rate Center to which the number is assigned (e.g., a non-native telephone number); or
- (3) If there is a failure of your broadband connection or loss of electrical power; or
- (4) If you fail to timely notify BtN Access of a change to the registered location for any number assigned to you in connection with the Service so that the ALI Database can be updated in a timely manner.

Due to the foregoing limitations, BtN Access highly recommends that all its customers retain at least one "plain old telephone service" ("POTS") line in case of disruption of the Service. In addition, BtN Access is enclosing warning labels to be affixed to your VoIP devices that will alert your end-users to these limitations.

Per the FCC's order, all VoIP service providers are required to obtain written acknowledgements of the foregoing service limitations. BtN Access requests that you return a copy of this letter, duly signed by you, to your BtN Sales representative no later than August 15, 2005.

Best regards,

Patrick Hannon
President, BtN Access, Inc.

Received and acknowledged this ____ day of _____, 2005 on behalf of the afore-referenced Customer:

By: _____

Its: _____

16 August 2005

Appendix B
Text of BtN Access Customer Notifications to Customers Overlooked in Original Mailing
(Sent August 16, 2005)

August 16, 2005

Dear _____:

The FCC recently issued its order on the provision E911 services that includes a requirement that service providers notify their customers of the limitations on any Voice over IP service. As a customer of BtN Access' Hosted PBX Service (formerly IP Centrex) (the "Service"), you should be aware that emergency dialing (E911) may not be available under certain circumstances, as described below:

- (1) If you move the IP-compatible equipment that you use to access the Service (whether a phone or personal computer or other device) from the registered location, as specified in your order form. Each phone number is registered in a national database (the "ALI Database") to a specific site address for emergency response purposes. If you dial E911 from a remote location using the Service, emergency personnel will respond to the registered site location listed in the ALI Database. They will not be able to identify or track your remote location; or
- (2) If you are using a number for a location that is outside the Rate Center to which the number is assigned (e.g., a non-native telephone number); or
- (3) If there is a failure of your broadband connection or loss of electrical power; or
- (4) If you fail to timely notify BtN Access of a change to the registered location for any number assigned to you in connection with the Service so that the ALI Database can be updated in a timely manner.

Due to the foregoing limitations, BtN Access highly recommends that all its customers retain at least one "plain old telephone service" ("POTS") line in case of disruption of the Service. In addition, BtN Access is enclosing warning labels to be affixed to your VoIP devices that will alert your end-users to these limitations.

Per the FCC's order, all VoIP service providers are required to obtain written acknowledgements of the foregoing service limitations prior to August 29, 2005. **THE FCC HAS MANDATED THAT VOIP SERVICE PROVIDERS SUSPEND SERVICE TO ALL CUSTOMERS WHO HAVE FAILED TO RETURN A SIGNED ACKNOWLEDGEMENT BY THAT DATE.** To avoid any disruption of service, please return your letter to BtN Access, Inc. at 12100 Sunset Hills Road, Suite 300, Reston, VA 20190, Attn: Customer Service or fax it to (703) 621-1621.

Best regards,

Patrick Hannon
President, BtN Access, Inc.

Received and acknowledged this ____ day of _____, 2005 on behalf of the afore-referenced Customer:

By: _____

Its: _____

16 August 2005

Appendix C

Follow-Up Email To Customers From Whom Signed Acknowledgements
Have Not Been Received
(Sent via Email on 16 August 2005)

BtN Access recently sent you a notification mandated by the FCC regarding the availability of 911 emergency dialing services via our VoIP service (Hosted PBX, formerly IP Centrex). Per the FCC, providers of VoIP services who do not receive affirmative acknowledgements of these notices from their customers are required to suspend service effective August 29, 2005.

Please note that as of today, BtN Access has not received your signed confirmation. You may mail the signed acknowledgement to BtN Access, Inc. at 12100 Sunset Hills Road, Suite 300, Reston, VA 20190, Attn: Customer Service or fax it to 703-621-1621. Your urgent attention to this matter is requested in order to avoid interruption of your service.

Best regards,

BtN Access Customer Service